

PageNet and PageNet would not object, therefore, to any reasonable Order adopted by the Commission.

PageNet would suggest, however, that this proceeding could readily be simplified by having each of the States clarify for the record the scope of the regulation they intend. PageNet's review of the various petitions filed suggests that none have any significant interest in non-cellular CMRS providers and many specifically limit their request for future regulation to cellular operators. Accordingly, the scope of the proceeding could be narrowed readily by requiring each of the states to identify whether and what basis it is seeking to regulate CMRS providers other than cellular operators, keeping in mind that any state may seek authority to regulate existing or new services if conditions change in the future.

Respectfully submitted,

PAGING NETWORK, INC.

By: 

Judith St. Ledger-Roty
James J. Freeman

REED SMITH SHAW & McCLAY
1200 18th Street, N.W.
Washington, D.C. 20036
(202) 457-6100

Its Attorneys

October 7, 1994

CERTIFICATE OF SERVICE

I, Jette Ward, a secretary with the law firm Reed Smith Shaw & McClay, hereby certify that on this 7th day of October, 1994, a true and correct copy of the foregoing "**COMMENTS OF PAGING NETWORK, INC. TO COMMISSION ORDER RE: STATE REGULATION OF CMRS RATES**" was sent by U.S. first-class mail, postage prepaid, to the following:

Thomas J. Casey, Esquire
Jay L. Birnbaum
Katherine T. Wallace
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, DC 20005
Counsel for Los Angeles Cellular
Telephone Company

Peter Arth, Jr., Esquire
Edward W. O'Neill, Esquire
Ellen S. Levin, Esquire
State of California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
Attorneys for the People of the State of California and the
Public Utilities Commission of the State of California

Joel H. Levy
William B. Wilhelm, Jr.
Cohn and Marks
Suite 600
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036
Attorneys for National Cellular Resellers Association

John Cimko, Chief
Mobile Services Division
Federal Communications Commission
Room 644; Mail Stop 1600D
1919 M Street, N.W.
Washington, D.C. 20054

David A. Gross, Esquire
Kathleen Q. Abernathy, Esquire
AirTouch Communications
1818 N Street, N.W.
8th Floor
Washington, D.C. 20036
Attorneys for AirTouch Communications

Mary B. Cranston, Esquire
Megan Waters Pierson, Esquire
Joseph A. Hearst, Esquire
Pillsbury Madison & Sutro
P.O. Box 7880
San Francisco, California 94120-7880
Attorneys for AirTouch Communications

Alan R. Shark, President
American Mobile Telecommunications Association, Inc.
1150 18th Street, N.W.
Suite 250
Washington, D.C. 20036

Elizabeth R. Sachs, Esquire
Lukas, McGowan, Nace & Gutierrez
1111 19th Street, N.W.
Suite 1200
Washington, D.C. 20036
Attorney for American Mobile Telecommunications
Association, Inc.

David A. Simpson, Esquire
Young, Vogl, Harlick & Wilson
425 California Street
Suite 2500
San Francisco, California 94101
Attorney for Bakersfield Cellular Telephone Company

Adam A. Anderson, Esquire
Suzanne Toller, Esquire
Bay Area Cellular Telephone Company
651 Gateway Boulevard
Suite 1500
San Francisco, California 94080

Richard Hansen, Chairman
Cellular Agents Trade Association
11268 Washington Blvd.
Suite 201
Culver City, California 90230

Michael B. Day, Esquire
Jeanne M. Bennett, Esquire
Michael J. Thompson, Esquire
Jerome F. Candelaria, Esquire
Wright & Talisman, P.C.
100 Bush Street, Shell Building
Suite 225
San Francisco, California 94104
Attorneys for Cellular Carriers Association of California

Michael F. Altschul, Esquire
Randall S. Coleman, Esquire
Andrea D. Williams, Esquire
Cellular Telecommunications Industry Association
1250 Connecticut Avenue, N.W.
Suite 200
Washington, D.C. 20036

Mark Gascoigne
Dennis Shelley
Information Technology Service
Internal Services Department
County of Los Angeles
9150 East Imperial Highway
Downey, California 90242
Attorneys for County of Los Angeles

Russell H. Fox, Esquire
Susan H.R. Jones, Esquire
Gardner, Carton & Douglas
1301 K Street, N.W.
Suite 900, East Tower
Washington, D.C. 20005
Attorneys for E.F. Johnson Company

David M. Wilson, Esquire
Young, Vogl, Harlick & Wilson
425 California Street
Suite 2500
San Francisco, California 94104
Attorney for Los Angeles Cellular Telephone Company

Scott K. Morris
Vice President of External Affairs
McCaw Cellular Communications, Inc.
5400 Carillon Point
Kirkland, Washington 98033

Howard J. Symons, Esquire
James A. Kirkland, Esquire
Cherie R. Kiser, Esquire
Kecia Boney, Esquire
Tara M. Corvo, Esquire
Mintz, Levin, Cohn, Ferris Glovsky and Popeo, P.C.
Suite 900
701 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Attorneys for McCaw Cellular Communications, Inc.

James M. Tobin, Esquire
Mary E. Wand, Esquire
Morrison & Foerster
345 California Street
San Francisco, CA 94104-2576
Attorneys for McCaw Cellular Communications, Inc.

Thomas Gutierrez, Esquire
J. Justin McClure, Esquire
Lukas, McGowan, Nace & Gutierrez, Chartered
1111 19th Street, N.W.
Suite 1200
Washington, D.C. 20036
Attorneys for Mobile Telecommunications
Technologies Corp.

Jeffrey S. Bork, Esquire
Laurie Bennett, Esquire
U.S. West Cellular of California, Inc.
1801 California Street
Suite 5100
Denver, Colorado 80202

Leonard J. Kennedy
Laura H. Phillips
Richard S. Denning
Dow, Lohnes & Albertson
1255 23rd Street, N.W.
Washington, D.C. 20037
Attorneys for Nextel Communications, Inc.

Mark J. Golden, Acting President
Personal Communications Industry
Association
1019 19th Street, N.W.
Suite 1100
Washington, D.C. 20036

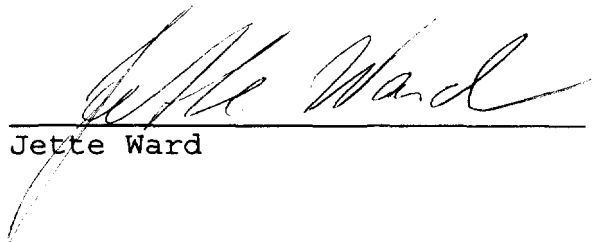
Michael Shames, Esquire
1717 Kettner Blvd.
Suite 105
San Diego, California 92101
Attorney for Utility Consumer's Action Network and
Towards Utility Rate Normalization

Peter A. Casciato
A Professional Corporation
Suite 701
8 California Street
San Francisco, California 94111

Lewis J. Paper
Keck, Mahin & Cate
1201 New York Avenue, N.W.
Washington, D.C. 20005
Attorneys for Cellular Resellers Association, Inc.,
Cellular Service, Inc., and Comtech, Inc.

William J. Sills, Esquire
Christine M. Crowe, Esquire
McFadden, Evans & Sill
1627 Eye Street, N.W.
Suite 810
Washington, D.C. 20006
Attorneys for GTE Services Corporation on behalf of ITS
Telephone and Personal Communications Companies

Richard McKenna
GTE Services Corporation
600 Hidden Ridge
HQ EO3J36
Irving, Texas 75015-6362



Jette Ward